

# EXHIBIT 1

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CLAUDINNE FELICIANO,

Plaintiff,

Index No.

-against-

17-CV-055507 (AKH)

CORELOGIC SAFERENT, LLC,  
a/k/a CORELOGIC RENTAL PROPERTY SOLUTIONS, LLC,

MS. CASTILLO: Defendant.

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Deposition of CLAUDINNE FELICIANO

Wednesday, November 28, 2018

New York, New York

REPORTED BY: Aline Akelis

Job No. 11659

1 Claudinne Feliciano

2 A Not necessarily. It was a,  
3 noticed that there was a case filed. I  
4 did not know what that meant.

5 Q Let me unpack this a little  
6 bit and make sure I understand. By the  
7 time that you reached, when you reached  
8 out to the labor attorney, when was  
9 that approximately, do you recall?

10 A Sometime in, I think now 2015  
11 perhaps.

12 Q I'll represent to you that  
13 when we talk about the housing court  
14 action, and we'll look at some  
15 documents, it's my understanding that  
16 that action was filed in 2014; does  
17 that sound correct to you?

18 A I don't know.

19 Q When you reached out to the  
20 labor attorney in approximately 2015,  
21 at that point in time had you received  
22 a copy of a document that showed the  
23 case that you reference as being open?

24 A Did I receive a copy of a  
25 document that showed that there was a

25

1 Claudinne Feliciano

2 case opened against me?

3 Q Yes.

4 A I'm sorry, I'm not sure I  
5 understand.

6 Q It's no problem. Let me  
7 rephrase.

8 You mentioned that you  
9 reached out to this labor attorney  
10 because you saw that -- I assume you're  
11 referring to a document. Is that  
12 correct?

13 A Yes.

14 Q What was that document?

15 A It was one from CoreLogic  
16 that showed, at the bottom, it had my  
17 name and it had this [deposition] that  
18 says "case filed."

19 Q And that's what prompted you  
20 to reach out --

21 A Correct.

22 Q -- labor attorney.

23 Just another thing for the  
24 record.

25 It's helpful for the court

41

1 Claudinne Feliciano

2 that.

3 Do you have any understanding  
4 of whether or not you're seeking to  
5 represent individuals who live in the  
6 state of New York or who live outside  
7 of the state of New York?

8 MR. FISHMAN: Object to the  
9 form.

10 A I don't know.

11 Q Do you know if there is more  
12 than one class that you're seeking to  
13 represent?

14 MR. FISHMAN: Object to the  
15 form.

16 A I don't know.

17 Q Now, you say that you  
18 understand that you're serving as a  
19 class representative, correct?

20 A Correct.

21 Q What's your understanding of  
22 your role as the class representative?

23 MR. FISHMAN: Object to the  
24 form.

25 A To act in the class' best

1 Claudinne Feliciano

2 interest and to be here and be made  
3 available for my attorneys, for the  
4 deposition and any other appearances or  
5 tasks that might be associated, too.

6 Q Was it your testimony earlier  
7 that you first came to interact with  
8 Mr. Fishman in 2015; is that correct?

9 A Correct.

10 Q Do you know when this  
11 lawsuit, the one that you currently  
12 have pending against CoreLogic, do you  
13 know when that was filed?

14 A The exact date?

15 Q To the best of your  
16 recollection.

17 A I'd have to confirm with  
18 Mr. Fishman as to exactly when he filed  
19 it.

20 Q Do you know if it was this  
21 past year?

22 MR. FISHMAN: I'm sorry, do  
23 you mean past year, the year prior  
24 to this year or this current year?

25 MR. ST. GEORGE: I mean this

1 Claudinne Feliciano

2 apartment?

3 A Yes.

4 Q When did you leave the

5 West 16th Street apartment?

6 A That was in, circa July 2014.

7 Q When you left the West 16th

8 Street apartment in July of 2014, you

9 moved in with your parents in the

10 Valley Cottage residence; is that

11 right?

12 A Correct.

13 Q And you were living with your

14 parents in the Valley Cottage residence

15 as of July of 2015.

16 A Correct.

17 Q How long had you lived at the

18 West 16th Street address at the time

19 that you moved out?

20 A Eight years.

21 Q Why did you move?

22 A Rent increase.

23 Q What was the nature of the

24 rent increase?

25 A They wanted for another two

1 Claudinne Feliciano

2 years close to 3,000 a month.

3 Q What were you paying at the  
4 time that you moved out?

5 A Circa 2,400.

6 Q They wanted an approximately  
7 \$600 increase in rent per month.

8 A Yeah.

9 MR. ST. GEORGE: You should  
10 all move to Richmond, by the way.  
11 \$3,000 a month might buy you a  
12 city block.

13 Q So the rent increase prompted  
14 you to move.

15 A Correct.

16 Q When you moved in with your  
17 parents, were you paying any rent at  
18 that time?

19 MR. FISHMAN: Object to the  
20 form. Are you asking her if she  
21 paid rent to her parents?

22 Q I'm just asking if you paid  
23 rent when you moved in with your  
24 parents.

25 A No.



70

1 Claudinne Feliciano  
2 it correct that while you were living  
3 with your parents you actually did  
4 apply to an apartment complex called  
5 Hunter's Point?

6 MR. FISHMAN: Object to the  
7 form.

8 A I applied there while I was  
9 still -- no, you're right.

10 No, you're not right. I  
11 applied -- that's why there's something  
12 wrong with the timeline.

13 I was still in my 27  
14 West 16th Street apartment when I  
15 applied at Hunter's Point.

16 Q Do you recall when you  
17 applied at Hunter's Point?

18 A It was through the lottery.

19 Q Explain to me what that  
20 means, as a non-New Yorker.

21 A There's a New York state  
22 lottery that you can go to for,  
23 essentially, rent, affordable housing  
24 like rent-stabilized apartments.

25 And it's a number of

71

1 Claudinne Feliciano  
2 different apartment complexes  
3 throughout the city. And it's income  
4 qualified, so based on your income they  
5 also, you qualify for a specific rent.  
6 And Hunter's Point came up as having,  
7 as now accepting applications.

8 Q So is it now your testimony  
9 that you were living at the West 16th  
10 Street apartment at the time that you  
11 applied to Hunter's Point?

12 A Through the lottery, correct,  
13 yes.

14 Q When did you apply to  
15 Hunter's Point?

16 A So that had to have been  
17 right before I moved out, May, June,  
18 time frame.

19 Q What year?

20 A Yeah, it had to have been  
21 then. If I moved out in 2014, then  
22 May, June of 2014.

23 Q Let me ask about that  
24 application.

25 What do you recall about the

1 Claudinne Feliciano

2 You don't know if you're going to be --  
3 it's literally, you're kind of throwing  
4 your name in a basket and hoping that  
5 it gets picked.

6 Q Okay. So you went online and  
7 submitted the application to Hunter's  
8 Point. Were you then contacted by  
9 Hunter's Point?

10 A No. I went online and just  
11 clicked that I would like to be entered  
12 into the lottery.

13 Q Tell me what happened after  
14 that.

15 A Hunter's Point contacted me  
16 and asked me to submit documentation  
17 for the application.

18 MR. FISHMAN: Excuse me, off  
19 the record for one second.

20 (Brief discussion off the record.)

21 Q Hunter's Point reached out to  
22 you and asked you to submit an  
23 application; is that correct?

24 A They requested documentation  
25 from me.

1 Claudinne Feliciano

2 Q What type of documentation,  
3 if you recall?

4 A I believe bank statements,  
5 employment confirmation. I don't  
6 recall the full list, but just the  
7 generic documentations that are usually  
8 requested at the time of a rental  
9 application.

10 Q What type of unit, if there  
11 was a specific type of unit at that  
12 point in time, what type of unit were  
13 you seeking to apply to rent at  
14 Hunter's Point?

15 A Studio to one bedroom. It  
16 would be whatever I income-qualified  
17 for.

18 Q What amount of rent were you  
19 hoping to pay or could you afford at  
20 that point in time?

21 A It was circa, around a little  
22 less than 2,000 for these units, from  
23 what I remember.

24 Q Skipping ahead just briefly,  
25 do you recall what rent you were paying

1 Claudinne Feliciano

2 for the Forest Hills residence?

3 A Forest Hills was 2,000.

4 Q Is it fair to say that the  
5 rent you paid at Forest Hills and the  
6 rent that you were potentially going to  
7 pay at Hunter's Point was pretty  
8 equivalent?

9 MS. CASTILLO: Object to the  
10 form.

11 A Yes.

12 Q Again, you did not pay rent  
13 during the period of time you lived  
14 with your parents.

15 A No.

16 Q So after you submitted the  
17 documentation to Hunter's Point that  
18 you've described, what happened next?

19 A After I submitted the  
20 documentation to Hunter's Point, I  
21 received notification that I was not, I  
22 did not get the apartment.

23 Q Do you recall how you  
24 received that notification; was it a  
25 letter, an e-mail, or a phone call?

1 Claudinne Feliciano

2 A I don't remember.

3 Q Did you ever go and tour  
4 Hunter's Point and see any of the  
5 units?

6 A No.

7 Q Do you recall if you ever had  
8 any telephone conversation with anyone  
9 at Hunter's Point or whether you  
10 communicated electronically?

11 A At the time of the...

12 Q At the time of the  
13 application.

14 A Well, via e-mail when they  
15 were requesting the documents.

16 Q So you did not communicate by  
17 phone, it was done by e-mail.

18 A From my recollection.

19 Q What did you do after you  
20 received notice from Hunter's Point  
21 that you did not, that you would not be  
22 able to rent an apartment there?

23 A I applied for another place  
24 at Rego Park.

25 Q Where is Rego Park?

1 Claudinne Feliciano

2 A In Queens.

3 Q Was that also through the  
4 lottery?

5 A No.

6 Q Were there other places other  
7 than, besides Hunter's Point that you  
8 could have applied to through the  
9 lottery?

10 A Yes, but none of them  
11 selected me.

12 Q I see. So the apartment  
13 complexes have to reach out to you --  
14 let me rephrase that.

15 As a result of the lottery,  
16 you submitted inquiries to a number of  
17 apartment complexes.

18 A Correct.

19 Q Do you recall how many?

20 A No.

21 Q Is it your testimony that  
22 Hunter's Point is the only one that  
23 responded to your inquiry?

24 A Correct.

25 Q Do you know whether or not

1 Claudinne Feliciano  
2 you would have been eligible to -- let  
3 me rephrase. I'm not sure -- I just  
4 don't understand how the lottery works.

5 Do you receive a type of rent  
6 subsidy as a result of the lottery?

7 A I don't know. For Hunter's  
8 Point, for this application, my  
9 understanding is that I would based on  
10 my income be eligible for rent,  
11 rent-stabilized.

12 Q So it's your understanding  
13 that you would have been eligible for  
14 rent-stabilized housing and that you  
15 would have paid a certain amount of  
16 rent each month at Hunter's Point.

17 A Correct.

18 Q Let's talk about Rego Park.

19 So after you were turned down  
20 by Hunter's Point you said that you  
21 applied at Rego Park in Queens,  
22 correct?

23 A Correct.

24 Q What was the result of that  
25 application?



1 Claudinne Feliciano

2 A Denied.

3 Q Do you know why?

4 A From my recollection it was  
5 due to adverse report, tenant report.

6 Q Do you have any documents  
7 that you received from Rego Park?

8 A No.

9 Q Do you recall the specific  
10 amount of rent that you were seeking to  
11 pay at Rego Park?

12 A I can give you a ballpark. I  
13 believe it was around eighteen-  
14 to 1900. I don't recall exact.

15 Q Okay. So apart from Hunter's  
16 Point and Rego Park, were there any  
17 other applications that you can recall  
18 submitting at the time that you were  
19 still living at the West 16th Street  
20 apartment complex?

21 A No.

22 Q After you were denied by  
23 Hunter's Point and Rego Park, I take it  
24 that you made the decision to move in  
25 with your parents.

1 Claudinne Feliciano

2 A Correct, correct.

3 Q It lists your annual salary  
4 as \$99,000; was that correct?

5 A Yes.

6 Q At the time that you were  
7 denied or you heard back from Hunter's  
8 Point that you weren't going to be able  
9 to rent the apartment there, you  
10 mentioned that you received some form  
11 of documentation from Hunter's Point;  
12 is that right?

13 A I don't recall how I got the  
14 notification. I don't remember how I  
15 got the notification that I was denied.

16 Q Do you recall any specifics  
17 that were provided by Hunter's Point as  
18 to why you had been denied?

19 A No.

20 Q Did you ever have any  
21 conversations after that with Hunter's  
22 Point about why you had been denied?

23 A After I had, I did. I had a  
24 conversation with Hunter's Point after  
25 I had chatted with James.

1 Claudinne Feliciano

2 Q Do you recall when that was?

3 A No.

4 Q Do you recall if it was  
5 in 2015 or 2016?

6 A No.

7 Q What was that conversation  
8 that you had with Hunter's Point?

9 A I called to request an  
10 adverse action letter.

11 Q What did they say, what did  
12 Hunter's Point say in response to that  
13 request?

14 A That they would mail me an  
15 adverse action letter.

16 Q Did they do so?

17 A Yes.

18 Q Did you review that letter?

19 A Yes.

20 Q What did it say, if you  
21 recall?

22 A I remember it being generic,  
23 just saying that there was -- what's  
24 the word for it -- inconsistencies on  
25 my credit report, something or other

1 Claudinne Feliciano  
2 like that. Again, very generic  
3 paraphrasing because I do not remember  
4 exact wording.

5 Q I'm going to hand you what  
6 I'll have marked as Exhibit 3.

7 (Exhibit 3, Hunter's Point South  
8 Leasing letter, July 27, 2015, 2 pages,  
9 marked for identification as of this  
10 date.)

11 Q Do you recognize this  
12 document, Ms. Feliciano?

13 A Yes.

14 Q Is this a copy of the letter  
15 that you received from Hunter's Point  
16 after you reached out to Hunter's  
17 Point?

18 A It looks like it.

19 Q The date at the top says  
20 July 27, 2015, do you see that?

21 A Yes.

22 Q Do you recall if that is the  
23 period of time when you reached out to  
24 Hunter's Point?

25 A No.

1 Claudinne Feliciano

2 Q Why do you say that? When  
3 had you reached out to Hunter's Point?

4 A It was after I had chatted  
5 with James. So he asked he if I had  
6 received such a copy, and I said no.

7 But this looks like what I  
8 was subsequently mailed after I had the  
9 follow-up conversation with Hunter's  
10 Point. And I don't remember when that  
11 was exactly.

12 Q Do you know if it would have  
13 been multiple months after July  
14 of 2015?

15 A Yes, most likely because I  
16 didn't see James right away, right.

17 Q Approximately how long after  
18 you applied to Hunter's Point did it  
19 take you to meet with Mr. Fishman?

20 A I don't recall. I don't  
21 recall our first meeting.

22 Q Do you know if it was a year  
23 or more after you were denied with  
24 Hunter's Point?

25 A I don't think it was more

1 Claudinne Feliciano  
2 than a year because I was already  
3 moving into Forest Hills.

4 I don't know, I don't  
5 remember.

6 Q Is it fair to say it was some  
7 period of months afterward, at least  
8 two months or more?

9 A I'm comfortable with at least  
10 two months or more. Anything other, I  
11 don't know.

12 Q Even though this document is  
13 dated July 27, 2015, it's your  
14 testimony that you didn't receive a  
15 copy of this document at that date, you  
16 received it at least two months later  
17 after you reached out to Hunter's  
18 Point.

19 A Correct.

20 Q If you look at the document,  
21 you see that the box, you see that it  
22 says, "Dear applicant, we are sorry to  
23 inform you that your application has  
24 been rejected. You have not met the  
25 standard screening criteria established

171

1 Claudinne Feliciano

2 had other than speaking?

3 A E-mail.

4 Q Do you know how many times we  
5 e-mailed each other, you to me, you to  
6 me and Ms. Castillo, Ms. Castillo just  
7 to you, or any combination?

8 A Various. I mean, there were  
9 numerous times.

10 Q Do you remember how many  
11 times we have communicated since the  
12 very first time we met, either on the  
13 phone, in person, or e-mail?

14 A A number.

15 Q Approximately.

16 A Over a dozen times. I mean,  
17 really, yeah, between e-mail and office  
18 visits, we've been in communication,  
19 constant communication.

20 Q Thank you. I also want to go  
21 over some things you mentioned earlier  
22 about your understanding of your role  
23 as the class representative and the  
24 seriousness to which you take that  
25 role. Can you describe that?

172

1 Claudinne Feliciano

2 A I'm prioritizing my role here  
3 with the utmost importance. I take  
4 this, this position very seriously.  
5 And I understood what I was signing up  
6 for at the beginning.

7 Q Are you prepared to do  
8 whatever is reasonably asked of you in  
9 connection with your role as class  
10 representative?

11 MR. ST. GEORGE: Object to  
12 form.

13 A Yes.

14 Q You also were asked before  
15 about being able to travel to New York  
16 for a trial.

17 A Mm-hmm.

18 Q And you stated that you would  
19 prioritize it. Can you tell us what is  
20 involved with you doing that and being  
21 able to do that, and do you see any  
22 difficulty in doing that?

23 MR. ST. GEORGE: Object to  
24 form.

25 A I don't, I don't actually see



173

1 Claudinne Feliciano  
2 any difficulty in that. You know, like  
3 I said before, I'm prioritizing my  
4 responsibilities here. With, you know,  
5 reasonable notice, I should be able to,  
6 you know, organize my work schedule and  
7 come out.

8 I don't have a position where  
9 I necessarily have to request  
10 permission to travel or take vacation.  
11 I'm not on an operational schedule  
12 where there are specific blackout  
13 dates.

14 So there's nothing that would  
15 impede me from being able to carry out  
16 my responsibilities and be present for  
17 a time frame with reasonable notice.

18 Q Other than traveling back to  
19 New York, assuming you're still in  
20 London at the time, if there's a trial  
21 of the case, do you see any other  
22 issues that could impair or impede your  
23 ability to fully serve as a class  
24 representative in this lawsuit?

25 A No.

1 Claudinne Feliciano

2 Q I know that there was a fair  
3 amount of discussion about a timeline  
4 and when you were living in different  
5 places, that you raised a number of  
6 times that you were not 100 percent  
7 certain or clear of the timeline as to  
8 when you left the West 16th Street  
9 apartment. Have you had an opportunity  
10 to refresh your recollection about that  
11 timeline?

12 A Yes.

13 Q What's your testimony as to  
14 when you left, when you moved out of  
15 the West 16th Street apartment? When  
16 did that occur?

17 A July of 2015.

18 Q July of 2015?

19 A Yes.

20 Q Where did you move to from  
21 there?

22 A My parents' house.

23 Q And you stayed with your  
24 parents until when?

25 A November of 2016.

175

1 Claudinne Feliciano

2 Q So based on that timeline,  
3 you were with your parents for about 16  
4 or 17 months.

5 A Yes.

6 Q During the period that you  
7 lived at West 16th Street, was  
8 FM United always the landlord or did it  
9 change?

10 A We had changes to the name of  
11 the company that we should write out  
12 our checks to, yes.

13 Q Who did you make the rent  
14 payments to?

15 A It would be FM United in this  
16 case. I forgot the name prior to when  
17 I first entered the apartment.

18 Q So sometime after you first  
19 moved into the apartment, the name on  
20 the check that you were told to write  
21 changed?

22 A Correct.

23 Q Do you know how long after  
24 you moved in did that happen?

25 A Probably, at least, probably

1 Claudinne Feliciano

2 into my second, my first renewal.

3 Q How many separate leases did  
4 you sign for that apartment?

5 A Three.

6 Q Would that be the initial  
7 lease -- when you first moved in, would  
8 that be lease number one?

9 A Correct.

10 Q When was lease number two?

11 A It was two-year leases. So  
12 that would be '08, '09, '10, '11, so  
13 that would be from '12, '13. So that  
14 would be from 2012 and then again in  
15 twenty -- I'm sorry. 2008, 2011 and  
16 then the last one before I left which I  
17 would have signed circa 2014.

18 They're not calendar years,  
19 right, because I would have -- if I  
20 signed the lease in August of 2008 then  
21 it would have been until August  
22 of 2009, August of 2010. And then I  
23 would have signed my new lease upon  
24 that for another two years, and then  
25 another two years.

177

1 Claudinne Feliciano

2 Q So your first renewal would  
3 have been in 2010.

4 A Yes.

5 Q Then your second renewal was  
6 in 2012.

7 A Correct.

8 Q Were you offered renewal  
9 leases each time, or did you ask for  
10 them, or how did that happen?

11 A They were provided. They  
12 mailed to me my renewal.

13 Q What was the mechanism or  
14 procedure you used to pay your rent  
15 during the period you lived at West  
16 16th Street, and if that changed would  
17 you tell us how it changed.

18 A Primarily via check. And  
19 then I did start doing Chase online  
20 pay. This didn't work out very well,  
21 as I soon found out that the landlord  
22 did not accept the online payment. But  
23 Chase did not credit the money back to  
24 my account.

25 Q Let's take it step by step.

178

1 Claudinne Feliciano

2 How did you set up this Chase online  
3 pay process, and what steps did you  
4 take to effectuate it?

5 A How did I set it up? Right  
6 on Chase online.

7 Q What did you do?

8 A I went online and I put in  
9 the name of my landlord, FM United,  
10 their address; standard information  
11 that the online form asks you.

12 Then you submit the amount  
13 that you want to pay and then click,  
14 send or okay or the magic button for it  
15 to go out.

16 Q What's your understanding as  
17 to what occurred after you hit send or  
18 okay; what was the process that then  
19 took place?

20 A Chase would debit it out of  
21 my account. The money, the funds are  
22 no longer available on my account. And  
23 that they would send it to whomever I  
24 would address them to send it.

25 Q Would they actually create a

179

1 Claudinne Feliciano  
2 paper check and put it in the mail and  
3 mail it to whoever --

4 A I don't know.

5 Q -- or did it go some other  
6 way?

7 A I don't know.

8 Q How quickly after you hit  
9 okay or send did that money get debited  
10 from your account?

11 A Immediately.

12 Q When did you start using that  
13 mechanism to pay your rent?

14 A I started using that  
15 around 2014.

16 Q Would you describe how that,  
17 did it work as you wanted to or  
18 something else?

19 A No, it did not work.

20 Q What was wrong with it and  
21 what occurred?

22 A Well, I was sending the  
23 payment via, I sent it out multiple  
24 months, actually. And then it appears,  
25 which I later found out from

180

1 Claudinne Feliciano  
2 conversations with the management  
3 company that they hadn't accepted the  
4 payment.

5 But that payment, as I stated  
6 before, wasn't being credited back to  
7 my account. So it looks like the money  
8 is gone. But there's a gap in which  
9 the other end wasn't receiving  
10 it-slash-accepting it.

11 And so then it looked on the  
12 record of the management company as  
13 though I hadn't paid my rent. But it  
14 looked on my records as if I had.

15 Q Mr. St. George asked you  
16 earlier about being delinquent in the  
17 rent. What were you referring to in  
18 response to those questions that he  
19 asked you about when he used the word  
20 "delinquent"?

21 A If I was late, right, on my  
22 rent payments.

23 Q Did you attribute delinquency  
24 to this problem you were having with  
25 Chase Pay? Was there any connection



181

1 Claudinne Feliciano  
2 between those two things or were they  
3 separate?

4 MR. ST. GEORGE: Object to  
5 form.

6 A I didn't think that I was  
7 being delinquent with Chase Pay. I  
8 wouldn't include that.

9 Q Did your landlord consider  
10 you to be delinquent while you were  
11 having problems with Chase Pay?

12 A Yes.

13 Q What, if anything, did you do  
14 about that?

15 A I called the landlord.

16 Q What occurred?

17 A I said that I had been using  
18 Chase Pay and -- the management  
19 company, I called and I've been using  
20 Chase Pay and that I don't understand  
21 because the money is not in my account.

22 And he said well we  
23 haven't -- I don't exactly recall the  
24 right word, if he said he wasn't  
25 accepting it or they were rejecting it

1 Claudinne Feliciano

2 or whatnot. But the money, they  
3 weren't taking the money for unknown  
4 reason.

5 And then I said, okay, but  
6 you're going to -- paraphrasing,  
7 obviously -- you're going to have to  
8 give me time now, because I have to  
9 call Chase and ask them where my money  
10 is, have them credit that to my  
11 account, and then I'm going to have to  
12 write you a check, because, in order to  
13 sort this situation out. They said,  
14 okay, that's fine.

15 I did that. I called Chase.  
16 They credited my money. I called the  
17 management company back that and told  
18 them that it was going to take X number  
19 of days, 24 to 48 hours for them to  
20 fully credit my bank account back,  
21 standard process, and that I would mail  
22 them a check for the amount owed.

23 Q What year did all that occur,  
24 in this conversation?

25 A That was 2014.

186

1 Claudinne Feliciano

2 Q What do you understand now?

3 A That they did not have to  
4 renew my lease.

5 Q Mr. St.George asked you  
6 before about whether -- you described  
7 that there was some stress related to  
8 the situation with the Hunter's Point  
9 application and denial.

10 Did that denial of that  
11 apartment have any effect or impact on  
12 your lifestyle or behavior?

13 I understand that  
14 Mr. St. George asked if the stress  
15 caused you to change your lifestyle or  
16 behavior. But I'm asking you a  
17 different question.

18 Did the inability to rent  
19 that apartment have any effect on your  
20 life, your lifestyle, your behavior, or  
21 anything related to your life?

22 MR. ST. GEORGE: Object to  
23 form.

24 A Yes. It made me alter my  
25 lifestyle significantly.

187

1 Claudinne Feliciano

2 Q How is that?

3 A Instead of living in the  
4 city, essentially being able to walk to  
5 work, I moved out to my parents' house;  
6 incurred the cost to move out to my  
7 parents' house; incurred the added cost  
8 to commute; and then, of course,  
9 incurred all the costs to continue  
10 looking for apartments.

11 I did just only apply to  
12 Forest Hills and luckily was able to  
13 sort that out and get accepted. But I  
14 had gone on numerous apartment, looking  
15 for various apartments throughout the  
16 city.

17 And then, of course, the  
18 added expense of having to move again  
19 from my parents' place to the Forest  
20 Hills apartment that I was ultimately  
21 able to secure.

22 And then, of course,  
23 throughout the time, just having, you  
24 know, all of the costs associated with  
25 having to commute in and out of the

1 Claudinne Feliciano  
2 city for work. And also just  
3 lifestyle, right. My friends are here,  
4 not in Rockland County.

5 Q Is there any difference  
6 between living in the city and living  
7 with your parents in terms of economic  
8 issues, expense of getting to work or  
9 to get anywhere else; can you describe  
10 what that was like?

11 MR. ST. GEORGE: Object to  
12 form.

13 Q For you economically. Did it  
14 have an economic impact on you?

15 MR. ST. GEORGE: Object to  
16 form.

17 A The added expense of  
18 traveling from the city, from upstate  
19 New York into the city?

20 Q I'm asking any kind of  
21 economic expense you incurred or  
22 experienced because you were not able  
23 to rent that Hunter's Point apartment.

24 A The added expense of my  
25 commute. The added expense of

1 Claudinne Feliciano

2 continuing to search for apartments.

3 Q Do you know how much the  
4 added expense for the commute was?

5 A Yeah, my ticket was a little  
6 bit over \$100 -- no, it was more than  
7 that. It was, I think up to almost 150  
8 a month.

9 Q As compared to, how much  
10 would it have cost if you were living  
11 at Hunter's Point and going to work  
12 from there?

13 A It would have just been the  
14 Metrocard.

15 Q I'm going to show you the  
16 complete Exhibit 7, which is the  
17 amended complaint that has the exhibits  
18 attached. I'm going to ask you to take  
19 a look at that. Do you have Exhibit 7?

20 A Yes.

21 Q And the pages attached at the  
22 end?

23 A I have these two documents.

24 MR. ST. GEORGE: Those are  
25 the two exhibits.

1 Claudinne Feliciano

2 Q Did you ever go to court in  
3 connection with that case; did you  
4 physically ever go to the court in  
5 connection with that case?

6 A No.

7 Q So you also testified earlier  
8 that you applied to rent an apartment  
9 in Forest Hills; do you remember the  
10 name of that landlord?

11 A Kaled Management Company.

12 Q I believe you also testified  
13 that there was initially a problem with  
14 that application; is that correct, what  
15 you said earlier?

16 A Yes.

17 Q What was the problem?

18 A It was rejected.

19 Q Why was it rejected?

20 A There was, the feedback that  
21 I got from the broker was that it  
22 looked like there was some case that  
23 was opened. I said that's incorrect  
24 and I e-mailed her the letter, the  
25 letter that shows that it was the

1 Claudinne Feliciano

2 expungement demand.

3 Q Let me show you, I'm going to  
4 ask you to take a look at Exhibit 5,  
5 page 3 of Exhibit 5 which is Bates  
6 stamped CLF 00078; do you recognize  
7 that document?

8 A Yes.

9 Q What, if anything, did you do  
10 with that document in connection with  
11 the Forest Hills application?

12 A This is the document I sent  
13 to the broker and she forwarded it on  
14 to the management company.

15 Q And what, if anything,  
16 occurred as a result of that?

17 A My application was approved.

18 Q How long after that did you  
19 move in there?

20 A Immediately.

21 Q Were you given a lease?

22 A Yes, for a year starting  
23 November 1, circa.

24 Q Of what year?

25 A 2016.